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7 Attorneys for Defendant
8 EQUIFAX INFORMATION SERVICES LLC

9 UNITED STATES DISTRICT COURT

10 DISTRICT OF NEVADA

11 MILLIE PHUNG SHIU,

12 Plaintiff,

13 v.

14 EQUIFAX INFORMATION SERVICES LLC,

15 Defendant.

Case No.: 2:18-cv-01949-KJD-GWF

**STIPULATION AND ORDER TO
EXTEND TIME**

(FIRST REQUEST)

16 Pursuant to LR 26-4, plaintiff Millie Phung Shu and defendant Equifax Information
17 Services, LLC, by and through their respective counsel of record, hereby stipulate to modify the
18 Court's Scheduling Order, dated January 29, 2019 (ECF No. 19), to extend the dispositive motion
19 deadline **only**.

20 The Parties note that no Party has failed to meet any discovery deadline and that the
21 dispositive motion deadline is not within 21 days. The purpose of this request is to extend the
22 dispositive motion deadline so that the Parties can continue to focus their time and resources on
23 the disposition of this matter without further litigation.

24 **A. Discovery Completed**

25 The Parties have served initial disclosures.

26 The Parties have exchanged written discovery.

27 **B. Discovery That Remains to Be Completed**

28 Due to recent discussions regarding settlement, Plaintiff requested an extension to submit

1 her discovery responses to August 1, 2019.

2 **Reason Discovery Has Not Been Completed**

3 The Parties have not failed to timely complete any discovery. The discovery cutoff occurred
4 on July 19, 2019. However, due to recent settlement discussions, the Parties agreed to extend
5 Plaintiff's deadline to serve her written discovery responses to August 1, 2019. Because of that
6 extension, the Parties seek to extend the current dispositive motion deadline of August 16, 2019
7 so that Equifax has sufficient time to review Plaintiff's discovery responses and evaluate
8 whether a dispositive motion is necessary

9 Further, the Parties seek the extension requested herein in order to facilitate disposition of
10 the action without further litigation. The Parties have been diligently working towards that end.

11 The Parties agree that no Party will suffer any prejudice as a result of the relief requested
12 herein. To the contrary, the proposed extension will facilitate a more efficient disposition of this
13 action and preserve judicial resources.

14 The foregoing constitutes good cause to amend the existing Scheduling Order pursuant to
15 LR 26-4 as requested below.

16 **C. Proposed Schedule for Completion of Discovery**

Event	Existing Deadline	Proposed Deadline
Amendment of Pleadings	February 26, 2019	
Expert Disclosures	May 17, 2019	
Interim Status Report	April 19, 2019	
Rebuttal Expert Disclosures	June 14, 2019	
Close of Discovery	July 19, 2019	
Dispositive Motions	August 16, 2019	September 15, 2019
Joint Pre-Trial Order	January 13, 2020	

1 **IT IS HEREBY STIPULATED AND AGREED** by and between the Parties to extend the
2 schedule for dispositive deadline as provided herein.

3 The Parties respectfully request the Court “so-order” this Stipulation
4
5 Dated this 23rd day of July, 2019.

6 CRAIG K. PERRY & ASSOCIATES

7 By: /s/ Craig K. Perry
8 Craig K. Perry, Esq.
9 3450 West Cheyenne Avenue, Suite 400
North Las Vegas, NV 89032
Attorneys for Plaintiff
Millie Phung Shiu

11 Dated this 23rd day of July, 2019.

12 CLARK HILL PLLC

14 By: /s/ Jeremy J. Thompson
Nicholas M. Wieczorek, Esq.
Jeremy J. Thompson, Esq.
3800 Howard Hughes Parkway, Suite 500
Las Vegas, NV 89169
Attorneys for Defendant
Equifax Information Services LLC

19 **IT IS SO ORDERED.**

20 
UNITED STATES MAGISTRATE JUDGE

22 DATED: 7/24/2019

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2 **CERTIFICATE OF SERVICE**

3 I hereby certify that on July 23, 2019, I electronically filed the foregoing STIPULATION
4 AND ORDER TO EXTEND TIME (FIRST REQUEST) with the Clerk of Court for the U.S.
5 District Court, District of Nevada by using the Court's CM/ECF system. Participants in the case
6 who are registered CM/ECF users will be served by the CM/ECF system.

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8 _____
9 /s/ *Richean Martin*
An Employee of Clark Hill PLLC

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